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DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE A Q PROGRAM



Agrium Conda Phosphate Operations*

3010 Conda Road
Soda Springs, ID 83276
Tel: 208-547-4381
Fax: 208-547-2550

August 3, 2007

Mr. Ken Hanna
Permit Program, Air Quality Division
Idaho Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706-1255

Subject: Agrium West Gypsum Stack, Part II ; Request for Permit to Construct

Ref: (a) IDAPA 58.01.01.200, PTC Requirements

Dear Ken:

In accordance with reference (a), Nu-West Industries, Agrium Conda Phosphate Operations (Agrium) requests approval of the enclosed PTC application. Agrium seeks to commence construction of the West Gypsum Stack Part II in 2009. The new stack will adjoin the West Gypsum Stack Part I that was constructed in 2005. The original gypsum stack, constructed in 1967, is also active and on the Agrium property.

On July 31, 2007, the financial office of Idaho DEQ in Boise contacted Agrium and acknowledged receipt of a permit fee check for \$1,000 for this PTC.

Agrium requests that if this PTC is issued prior to the issuance of the pending Tier I (Title V) permit renewal, that this PTC be included in the new Tier I permit.

Questions concerning this request should be referred to me directly at (208) 547-4381 ext. 263.

With best regards,

A handwritten signature in cursive script, reading 'Coleman Kavanagh'.

Coleman Kavanagh
Environmental Supervisor



* A Registered Name of Nu-West Industries, Inc.

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AUG - 9 2007

DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE AQ PROGRAM

DE/AFS/SF

**PERMIT TO CONSTRUCT APPLICATION for
NU-WEST INDUSTRIES, INC.,
AGRIUM CONDA PHOSPHATE OPERATIONS
SODA SPRINGS, IDAHO**

August 2, 2007

Kleinfelder Project Number: 86045

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Prepared for:

**NU-WEST INDUSTRIES, INC.,
AGRIUM CONDA PHOSPHATE OPERATIONS
3010 Conda Road
Soda Springs, Idaho 83276**

**PERMIT TO CONSTRUCT APPLICATION for
AGRIUM CONDA PHOSPHATE OPERATIONS
Proposed 2009 West Phosphogypsum Stack, Part II**

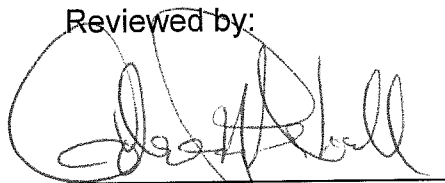
Kleinfelder Job No: 86045

Prepared by:



Estee A. Lafrenz, P.E.
Air Quality Engineer / Project Manager

Reviewed by:



Andrew P. Marshall, P.E.
Environmental Department Manager

KLEINFELDER
2315 S. Cobalt Point Way
Meridian Idaho 83642
(208) 893-9700

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
1. EXECUTIVE SUMMARY	1
2. INTRODUCTION AND PURPOSE	3
2.1. General Overview	3
2.2. Project Overview	3
2.3. Facility Layout	4
2.4. Construction Schedule	4
3. PROJECT EMISSIONS AND AQIA RESULTS	5
3.1. Gyp Stack Potential Emission Sources	5
3.2. Pollutants of Concern and Potential Emissions	5
3.3. Summary of PTC Emission Rates and Future Emission Rates	6
3.4. Ambient Air Quality Impact Assessment Results Summary	6
4. APPLICABLE REGULATIONS	8
4.1. Federal Regulations Applicable to the Gyp Stack PTC Application	8
4.2. State Rules Applicable to the Gyp Stack PTC Application	8

APPENDICES

Appendix A: Figures

Appendix B: IDEQ Permit Application Forms

Appendix C: Proposed Gyp Stack Emission Calculations and PTE Summary Table

Appendix D: Applicable Federal Regulations and State Rules

LIST OF FIGURES

Figure A-1: Site Location Map

Figure A-2: Vicinity Map

Figure A-3: Facility Layout Map

Figure A-3: Facility Layout Map (Inset)

LIST OF TABLES

Table 3-1: Potential Emissions for Proposed New Gyp Stack Source

Table 3-2: Facility-Wide Current and Future Emission Levels

Table 3-3: Model Results Summary and Applicable Standards

1. EXECUTIVE SUMMARY

The Nu-West Industries, Agrium Conda Phosphate Operations ("Agrium") facility is submitting this permit to construct ("PTC") application to allow for the addition of a proposed Part II 125-acre gypsum stack. The facility currently operates under a Tier I permit number T1-040308 and submitted a renewal application on April 28, 2006.

Agrium constructed and operates the 125-acre West Phosphogypsum Stack, Part I under PTC #P-050312, dated July 22, 2005. Part II will be a nearly identical 125-acre gyp stack located next to Part I, as shown in Figure A-3. The proposed Part II 125-acre gyp stack is anticipated to be prepared and constructed for use in 2009. The nature of the proposed source is to allow for additional area for future storage of the phosphogypsum by-product from the existing operations.

Agrium is located in Soda Springs, Caribou County, Idaho and is a producer of phosphate based fertilizers, various grades of phosphoric acid, and sulfuric acid. Phosphoric acid production processes at Agrium result in the generation of a phosphogypsum slurry by-product that is stored in large piles called "gyp stacks". The existing gyp stacks cover approximately 250 acres with a height of approximately 175 feet. An additional 125-acre area has been designated for the new proposed gyp stack to be used for future storage capacity of the phosphogypsum by-product. This PTC application is being submitted for permitting of this new proposed Part II 125-acre gyp stack.

Potential emissions from the new gyp stack include particulate matter and fluorides. PM_{10} emissions are estimated to be 1.88 tons per year, $PM_{2.5}$ emissions are estimated to be 0.29 tons per year, and fluoride emissions are estimated to be 1.83 tons per year.

This application addresses the permitting requirements for the proposed gyp stack PTC. Section 2 provides an overview of the project. Section 3 discusses the project emissions and AQIA results. Section 4 addresses the applicable regulations. Facility figures are provided in Appendix A, IDEQ PTC application forms are provided in Appendix B, and emission calculations and the facility-wide PTE summary table are shown in Appendix C. A Regulatory applicability review for this project is provided in Appendix D.

If there are any questions about the proposed project or this application, the following points of contact are available:

Agrium Conda Phosphate Operations:

Mr. Coleman Kavanagh
3010 Conda Road
Soda Springs, ID 83276
(208) 547-4381 x263
e-mail: ckavanag@agrium.com

Kleinfelder:

Ms. Estee Lafrenz
2315 S. Cobalt Point Way
Meridian, ID 83642
(208) 893-9700
(208) 893-9703 fax
e-mail: elafrenz@kleinfelder.com

2. INTRODUCTION AND PURPOSE

2.1. General Overview

The Nu-West Industries, Agrium Conda Phosphate Operations ("Agrium") operates under SIC code 2874, defined as a phosphate fertilizer production plant. Agrium produces phosphate-based fertilizers, including granular fertilizers, monoammonium phosphate (MAP) and ammonium phosphate sulfate (APS). The facility also produces a liquid fertilizer called superphosphoric acid (SPA) and merchant grade phosphoric acid (MGA). Sulfuric acid is used in the production of fertilizer and is either manufactured at the Agrium facility or purchased from other sources. During the phosphoric acid production process, wet crystals of calcium sulfate (known as phosphogypsum) are created. The wet phosphogypsum (gyp) is placed into cooling ponds, which settle and harden into what are known as gyp stacks.

Agrium is defined as a major facility in accordance with IDAPA 58.01.01.008.10, since the facility has a PTE for SO₂ and NO_x of over 100 tons per year, for each pollutant. Agrium is also defined as a designated facility in accordance with IDAPA 58.01.01.006.27, since the facility contains a sulfuric acid plant. The facility currently operates under a Tier I permit (T1-040308) and submitted a renewal application to the Idaho Department of Environmental Quality (IDEQ) on April 27, 2006.

Agrium is located in Caribou County, which is designated as attainment or unclassifiable for all criteria pollutants. The facility is located in eastern Idaho about 7 miles (11 km) north of the city of Soda Springs, Idaho. The approximate center point of the property is located at UTM 455,684 N by 4,731,803 E, Zone 12 (NAD83). The facility and surrounding area is a sparsely populated, rural area with terrain ranging from about 6,000 to 7,000 feet above mean sea level (MSL) within 1 mile (1.6 km) of the facility. A Site Location Map, Vicinity Map and Facility Layout Map (showing the proposed new gyp stack location) are respectively provided as Figures A-1 through A-3 in Appendix A.

2.2. Project Overview

The Agrium facility is submitting this permit to construct ("PTC") application to allow for the addition of a proposed new emission source. Agrium's phosphate-based fertilizer production process results in the generation of a phosphogypsum slurry by-product that is stored in large piles called "gyp stacks". The existing gyp stacks cover approximately 250 acres with a height of approximately 175 feet. An additional 125-acre area has

been designated for a new proposed gyp stack to be used for future storage capacity of the phosphogypsum by-product, which is the basis for this PTC application.

2.3. Facility Layout

The facility layout is provided in Figure A-3, Appendix A. As shown, the new planned gyp stack will be located along the western portion of the property covering approximately 125 acres. The location of the slurry pond will vary as the stack is created. The remaining sources shown in Figure A-3 consist of existing sources.

2.4. Construction Schedule

Placement of phosphogypsum onto the proposed gyp stack is scheduled to begin in calendar year 2009.

3. PROJECT EMISSIONS AND AQIA RESULTS

3.1. Gyp Stack Potential Emission Sources

Emissions related to the gyp stacks include particulate matter and fluorides. Phosphogypsum slurry is approximately 20% solids, which upon handling and drying will potentially release fugitive particulate matter and gaseous fluoride emissions into the atmosphere. The fugitive particulate matter contains fluorosilicates, which are considered to be emitted as fluorides (F⁻). As the gyp stacks are allowed to dry, the phosphogypsum will harden into a solid mass, with negligible potential for wind blown dust.

No additional heavy equipment emissions are associated with this PTC application, since there is no increase in the rate of phosphogypsum by-product will be generated from the facility. For heavy equipment, the same amount of phosphogypsum will be handled, but the location that the by-product is placed into will vary between the old gyp stacks and the new proposed gyp stacks.

The nature of the proposed source is to allow for additional area for future storage of the phosphogypsum by-product from the existing operations. As a result, this will not affect the existing facility processes or emission controls.

3.2. Pollutants of Concern and Potential Emissions

Potential particulate emissions from the proposed gyp stack, assuming the maximum storage area of 125 acres has been filled, are estimated to be 1.88 tons per year of PM₁₀ and 0.29 tons per year of PM_{2.5}. Since the significant emission threshold for PM₁₀ is 15 tons per year, this project is not considered a major modification for PM₁₀ or PM_{2.5}. Potential emissions of PM₁₀ exceed the modeling threshold of 1 ton per year. Potential emissions of PM_{2.5} do not currently have a modeling threshold, but were also modeled.

The proposed gyp stack will also result in potential emissions of fluoride, listed as a non-carcinogenic TAP in IDAPA 58.01.01.585. The potential fluoride emissions are estimated to be 1.83 tons per year at maximum capacity, which exceed the listed TAP screening EL of 0.167 pounds per hour. An ambient air quality impact analysis ("AQIA") was completed to address the potential impacts of these regulated compounds. The potential fluoride emissions do not exceed the significance threshold of 3 tons per year.

3.3. Summary of PTC Emission Rates and Future Emission Rates

The potential emission rates from the proposed gyp stack are summarized in Table 3-1. Detailed emission calculations for this project and a summary of the new facility-wide PTE emissions are provided in Appendix C of this permit application.

Table 3-1: Potential Emissions for Proposed New Gyp Stack Source

Source ID	Description	Potential Emission Rates					
		PM ₁₀		PM _{2.5}		Fluoride	
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
F-Gyp-2	2009 Gyp Stack	0.43	1.88	0.07	0.29	0.42	1.83

The current annual facility-wide potential to emit, requested emissions increase for the proposed gyp stack, and future potential to emit for particulate matter and fluoride are summarized in Table 3-2.

Table 3-2: Facility-Wide Current and Future Emission Levels

Pollutant	Current PTE	Requested Emissions Increase	Future PTE
	(ton/yr)	(ton/yr)	(ton/yr)
PM ₁₀	79.47	1.88	81.35
PM _{2.5}	11.43	0.29	11.71
Fluoride	16.06	1.83	17.88

3.4. Ambient Air Quality Impact Assessment Results Summary

An AQIA modeling protocol was prepared and submitted to IDEQ for review and approval on June 4, 2007. A separate AQIA modeling report document, detailing methodology and results, is submitted concurrently with this PTC application. The model results are summarized below.

Using AERMOD, with the approved modeling protocol methodology, the gyp stack was modeled as an area source. The area represents the overall gypsum stack, covering 125 acres, with a release height of 2/3 the maximum gyp stack height of 175 feet.

A preliminary assessment (PA) was performed for particulate emissions from the gyp stack only. The maximum 24-hr PM₁₀ impacts were 1.33 µg/m³. The maximum annual PM_{2.5} emission impacts were 0.04 µg/m³ and the 24-hr PM_{2.5} impacts were 0.40 µg/m³. These results were below the Significant Contribution Level (SCL) for PM₁₀/PM_{2.5} for all

averaging periods, therefore an FIA level analysis was not required. The results are summarized in Table 3-3.

For the fluoride emission impacts, because this is a listed TAP, a Full Impact Assessment (FIA) level analysis of facility wide fluoride emissions was conducted. The 24-hr fluoride emission impacts were 4.20 $\mu\text{g}/\text{m}^3$. Therefore, fluoride emission impacts are well below the AAC, as shown in Table 3-3.

Table 3-3: Model Results Summary and Applicable Standards

Pollutant	Averaging Period	Source Impacts ($\mu\text{g}/\text{m}^3$)	SCL ($\mu\text{g}/\text{m}^3$)	AAC ($\mu\text{g}/\text{m}^3$)
PM-10	24-hour	1.33	5.0	-
PM-2.5	24-hour	0.40	5.0	-
	Annual	0.07	1.0	
Fluoride	24-hour	4.20	N/A	125

In summary, PM10 and PM2.5 emission impacts do not exceed the SCLs and fluoride emission impacts do not exceed the AAC standard.

4. APPLICABLE REGULATIONS

4.1. Federal Regulations Applicable to the Gyp Stack PTC Application

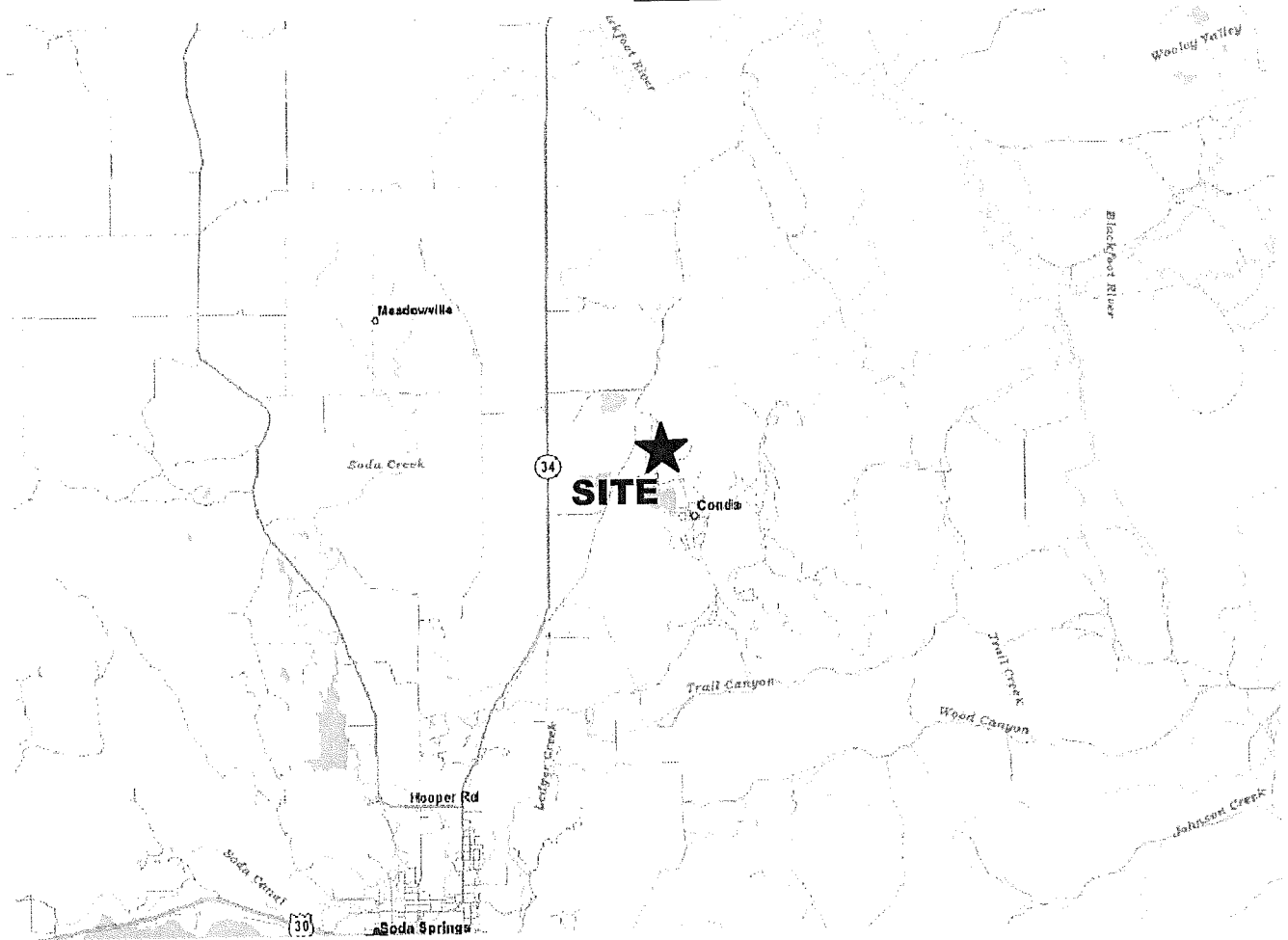
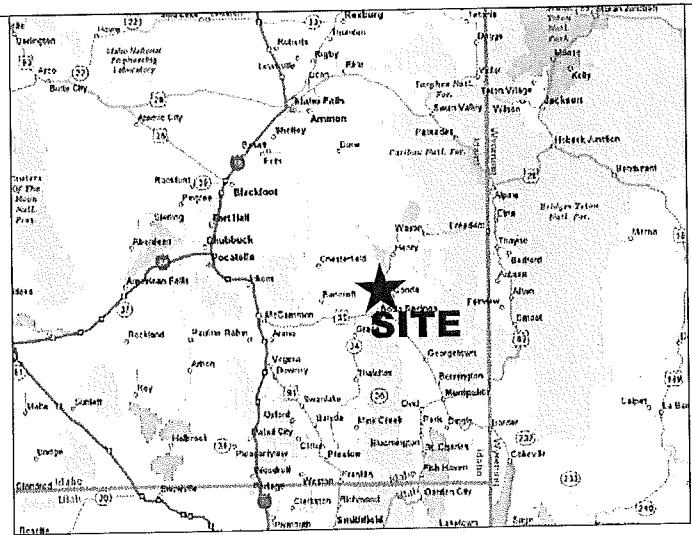
Federal regulations that apply to this PTC application are shown in Table D-1 of Appendix D. Many of the regulations apply to the Agrium facility, but are not specific to the gyp stacks.

4.2. State Rules Applicable to the Gyp Stack PTC Application

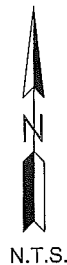
State (IDEQ) rules that apply to this PTC application are shown in Table D-2 of Appendix D.

APPENDIX A

FIGURES



Copyright Mapquest 2006



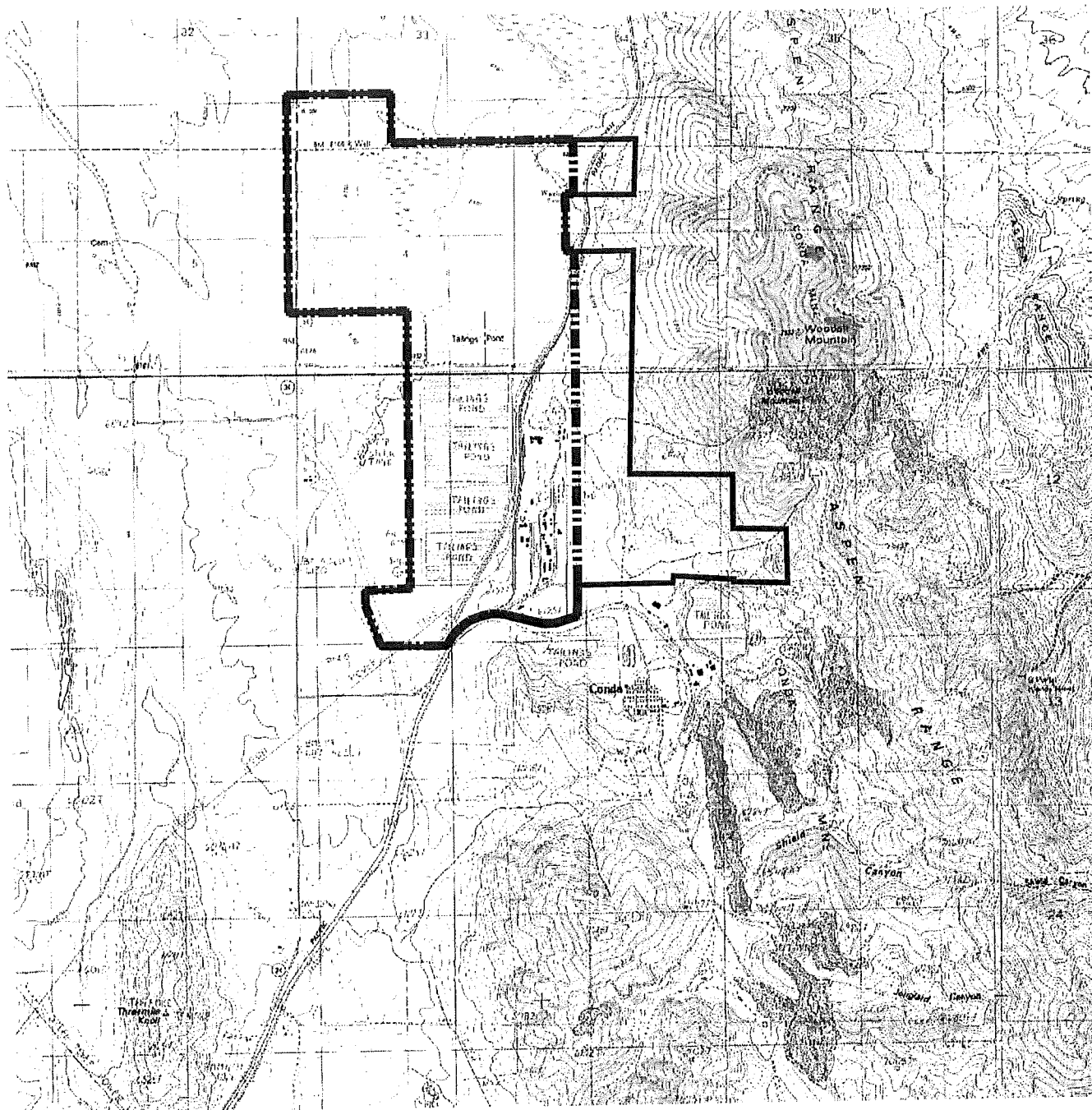
KLEINFELDER



Project Location Map
 NU-West Industries, Inc.
 Agrium Conda Phosphate Operations
 Soda Springs, Idaho

Figure

A-1

Checked By: K. Allen	Drafted By: S. Hyskell
Project Number: 81886-202	Date: May, 2007



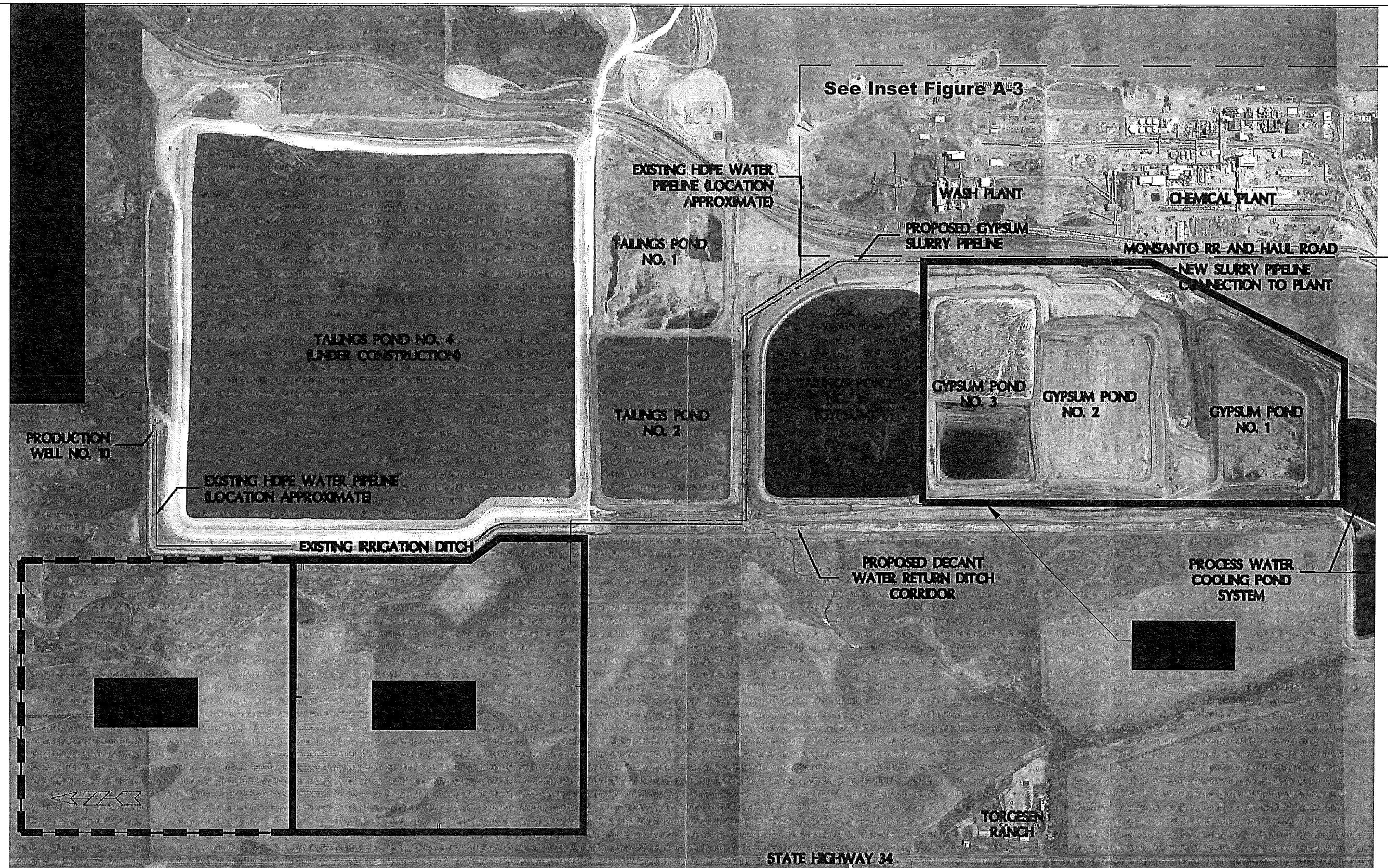
 Control Boundary
 Property Boundary

KLEINFELDER

Vicinity Map
 NU-West Industries, Inc.
 Agrium Conda Phosphate Operations
 Soda Springs, Idaho

Figure
 A-2

Checked By: K. Allen	Drafted By: S. Hyskell
Project Number: 81886-202	Date: May, 2007



Reference: Base Map Provided by Engineers, Inc., May 2007

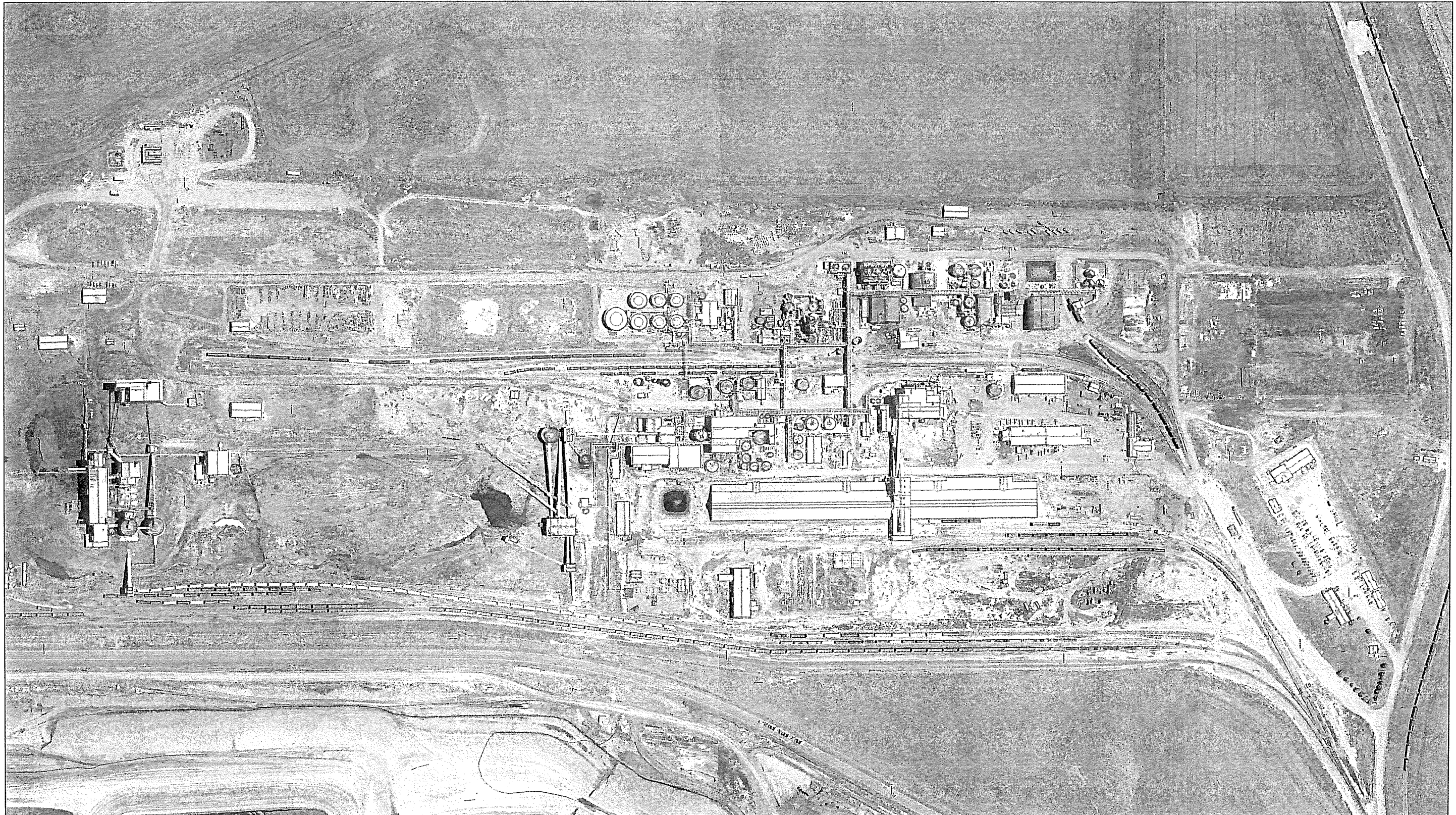


KLEINFELDER

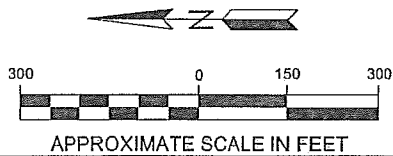
Checked By: K. Allen	Drafted By: S. Hyskell
Project Number: 81886-202	Date: July, 2007

Overall Facility Layout
 NU-West Industries, Inc.
 Agrium Conda Phosphate Operations
 Soda Springs, Idaho

Figure
 A-3



Reference: Base Map Provided by 3Di West, April 2006



KLEINFELDER

Checked By: K. Allen	Drafted By: S. Hyskell
Project Number: 81886-202	Date: May, 2007

Manufacturing Facility Layout
NU-West Industries, Inc.
Agrium Conda Phosphate Operations
Soda Springs, Idaho

Inset
Figure
A-3

APPENDIX B

IDEQ PERMIT APPLICATION FORMS



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 2
 02/13/07

Please see instructions on page 2 before filling out the form.

COMPANY NAME, FACILITY NAME, AND FACILITY ID NUMBER

1. Company Name Nu-West Industries, Inc.

2. Facility Name Agrium Conda Phosphate Operations 3. Facility ID No. 029-00003

4. Brief Project Description - PTC for construction of a new 125-acre phosphogypsum stack.
 One sentence or less

PERMIT APPLICATION TYPE

5. ☐ New Facility ☒ New Source at Existing Facility ☐ Unpermitted Existing Source
☐ Modify Existing Source: Permit No.: _____ Date Issued: _____
☐ Required by Enforcement Action: Case No.: _____

6. ☒ Minor PTC ☐ Major PTC

FORMS INCLUDED

Included	N/A	Forms	DEQ Verify
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form GI – Facility Information	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form EU0 – Emissions Units General	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU1 - Industrial Engine Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU2 - Nonmetallic Mineral Processing Plants Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU3 - Spray Paint Booth Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU4 - Cooling Tower Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU5 – Boiler Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form HMAP – Hot Mix Asphalt Plant Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form CBP - Concrete Batch Plant Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form BCE - Baghouses Control Equipment	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form SCE - Scrubbers Control Equipment	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Forms EI-CP1 - EI-CP4 - Emissions Inventory– criteria pollutants (Excel workbook, all 4 worksheets)	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	PP – Plot Plan	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Forms MI1 – MI4 – Modeling (Excel workbook, all 4 worksheets) *	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form FRA – Federal Regulation Applicability	<input type="checkbox"/>

DEQ USE ONLY

Date Received

Project Number

Payment / Fees Included?

Yes ☐ No ☐

Check Number

* Included in the AQIA Report



DEQ AIR QUALITY PROGRAM
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For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 3
03/26/07

Please see instructions on page 2 before filling out the form.

All information is required. If information is missing, the application will not be processed.

IDENTIFICATION	
1. Company Name	Nu-West Industries, Inc.
2. Facility Name (if different than #1)	Agrium Conda Phosphate Operations
3. Facility I.D. No.	029-00003
4. Brief Project Description:	PTC application for construction of a new 125-acre phosphogypsum stack.
FACILITY INFORMATION	
5. Owned/operated by: (✓ if applicable)	<input type="checkbox"/> Federal government <input type="checkbox"/> County government <input type="checkbox"/> State government <input type="checkbox"/> City government
6. Primary Facility Permit Contact Person/Title	Coleman Kavanagh, Environmental Supervisor
7. Telephone Number and Email Address	(208) 547-4381, ext. 263; CKavanag@Agrium.com
8. Alternate Facility Contact Person/Title	Charles H. Ross, General Manager
9. Telephone Number and Email Address	(208) 547-4381
10. Address to which permit should be sent	3010 Conda Road
11. City/State/Zip	Soda Springs, ID 83276
12. Equipment Location Address (if different than #10)	
13. City/State/Zip	
14. Is the Equipment Portable?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
15. SIC Code(s) and NAISC Code	Primary SIC: 325314 Secondary SIC (if any): NAICS:
16. Brief Business Description and Principal Product	Agrium Conda Phosphate Operations produces phosphate-based fertilizer products.
17. Identify any adjacent or contiguous facility that this company owns and/or operates	
PERMIT APPLICATION TYPE	
18. Specify Reason for Application	<input type="checkbox"/> New Facility <input checked="" type="checkbox"/> New Source at Existing Facility <input type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modify Existing Source: Permit No.: _____ Date Issued: _____ <input type="checkbox"/> Permit Revision <input type="checkbox"/> Required by Enforcement Action: Case No.: _____
CERTIFICATION	
IN ACCORDANCE WITH IDAPA 58.01.01.123 (RULES FOR THE CONTROL OF AIR POLLUTION IN IDAHO), I CERTIFY BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION IN THE DOCUMENT ARE TRUE, ACCURATE, AND COMPLETE.	
19. Responsible Official's Name/Title	Charles H. Ross, General Manager
20. RESPONSIBLE OFFICIAL SIGNATURE	CH Ross by: <i>Jan D. Doode</i> Date: 08/03/07
21. <input checked="" type="checkbox"/> Check here to indicate you would like to review a draft permit prior to final issuance.	



DEQ AIR QUALITY PROGRAM
1410 N. Hilton, Boise, ID 83706
For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

Emissions Unit - General **Form EU0**

PERMIT TO CONSTRUCT APPLICATION

Revision 2
02/14/07

Please see instructions on page 2 before filling out the form.

IDENTIFICATION						
Company Name: Nu-West Industries, Inc.		Facility Name: Agrium Conda Phosphate Operations			Facility ID No: 029-00003	
Brief Project Description:		PTC application for construction of a new 125-acre phosphogypsum stack.				
EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION						
1. Emissions Unit (EU) Name:		2009 GYP STACK				
2. EU ID Number:		F-GYP-2				
3. EU Type:		<input checked="" type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #:				Date Issued:
4. Manufacturer:		N/A				
5. Model:		N/A				
6. Maximum Capacity:		125-ACRES				
7. Date of Construction:		2009				
8. Date of Modification (if any)		N/A				
9. Is this a Controlled Emission Unit?		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.				
EMISSIONS CONTROL EQUIPMENT						
10. Control Equipment Name and ID:		N/A				
11. Date of Installation:		12. Date of Modification (if any):				
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different than emission units(s) involved?:		<input type="checkbox"/> Yes <input type="checkbox"/> No				
16. Does the manufacturer guarantee the control efficiency of the control equipment?		<input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)				
Control Efficiency	Pollutant Controlled					
	PM	PM10	SO ₂	NOx	VOC	CO
17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.						
EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)						
18. Actual Operation		8,760 HOURS PER YEAR				
19. Maximum Operation		8,760 HOURS PER YEAR				
REQUESTED LIMITS						
20. Are you requesting any permit limits?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If Yes, check all that apply below)				
<input type="checkbox"/> Operation Hour Limit(s):						
<input type="checkbox"/> Production Limit(s):						
<input type="checkbox"/> Material Usage Limit(s):						
<input type="checkbox"/> Limits Based on Stack Testing		Please attach all relevant stack testing summary reports				
<input type="checkbox"/> Other:						
21. Rationale for Requesting the Limit(s):						

DEQ AIR QUALITY PROGRAM 1410 N. Hilton, Boise, ID 83706 For assistance, call the Air Permit Hotline - 1-877-5PERMIT		PERMIT TO CONSTRUCT APPLICATION Revision 2 4/5/2007									
Please see instructions on page 2 before filling out the form.											
Company Name: Facility Name: Facility ID No.:		Nu-West Industries, Inc. Agrium Conda Phosphate Operations 029-00003									
Brief Project Description:		PTC application for construction of a new 125-acre phosphogypsum stack.									
SUMMARY OF FACILITY WIDE EMISSION RATES FOR CRITERIA POLLUTANTS - FUGITIVE SOURCES											
1.		2.		3.							
Fugitive Source Name		PM ₁₀		SO ₂		NO _x		CO		VOC	
		lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
name of fugitive source1	F-GYP-2	0.43	1.88								
name of fugitive source2											
name of fugitive source3											
name of fugitive source4											
name of fugitive source5											
name of fugitive source6											
name of fugitive source7											
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name of fugitive source21											
(insert more rows as needed)											
Total		0.43	1.88								

PERMIT TO CONSTRUCT APPLICATION

Revision 3
4/5/2007

DEAIR QUALITY PROGRAM

1410 N. Hilton, Boise, ID 83706

For assistance, call the

Air Permit Hotline - 1-877-5PERMIT

Please see instructions on page 2 before filling out the form.

Company Name:	Nu-West Industries, Inc.
Facility Name:	Agrium Conda Phosphate Operations
Facility ID No.:	029-00003

Brief Project Description: PTC application for construction of a new 125-acre phosphogypsum stack.

SUMMARY OF EMISSIONS INCREASE (PROPOSED PTE - PREVIOUSLY MODELED PTE) - FUGITIVE SOURCES

1.		2.		3. Air Pollutant Maximum Change in Emissions Rate (lbs/hr or t/yr)										Lead	
Fugitive Source Name		Fugitive ID	PM ₁₀		SO ₂		NO _x		CO		VOC		lb/hr	T/yr	
Fugitive Source(s)															
name of fugitive source1		F-GYP-2	0.43	1.88											
name of fugitive source2															
name of fugitive source3															
name of fugitive source4															
name of fugitive source5															
name of fugitive source6															
name of fugitive source7															
name of fugitive source8															
name of fugitive source9															
name of fugitive source10															
name of fugitive source11															
name of fugitive source12															
name of fugitive source13															
name of fugitive source14															
name of fugitive source15															
name of fugitive source16															
name of fugitive source17															
name of fugitive source18															
name of fugitive source19															
name of fugitive source20															
name of fugitive source21															
(insert more rows as needed)															
Total			0.43	1.88											



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 2
 02/14/07

Please see instructions on page 2 before filling out the form.

IDENTIFICATION		
Company Name: Nu-West Industries, Inc.	Facility Name: Agrium Conda Phosphate Operations	Facility ID No: 029-00003
Brief Project Description: PTC application for construction of a new 125-acre phosphogypsum stack		
APPLICABILITY DETERMINATION		
1. Will this project be subject to 1990 CAA Section 112(g)? (Case-by-Case MACT)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES*	* If YES then applicant must submit an application for a case-by-case MACT determination [IAC 567 22-1(3)"b" (8)]
2. Will this project be subject to a New Source Performance Standard? (40 CFR part 60)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES*	*If YES please identify sub-part: _____
3. Will this project be subject to a MACT (<u>M</u> aximum <u>A</u> chievable <u>C</u> ontrol <u>T</u> echnology) regulation? (40 CFR part 63)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES*	*If YES please identify sub-part: _____
THIS ONLY APPLIES IF THE PROJECT EMITS A HAZARDOUS AIR POLLUTANT		
4. Will this project be subject to a NESHAP (<u>N</u> ational <u>E</u> mission <u>S</u> tandards for <u>H</u> azardous <u>A</u> ir <u>P</u> ollutants) regulation? (40 CFR part 61)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES*	*If YES please identify sub-part: _____
5. Will this project be subject to PSD (<u>P</u> revention of <u>S</u> ignificant <u>D</u> eterioration)? (40 CFR section 52.21)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	
6. Was netting done for this project to avoid PSD?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES*	*If YES please attach netting calculations
IF YOU ARE UNSURE HOW TO ANSWER ANY OF THESE QUESTIONS, CALL THE AIR PERMIT HOTLINE AT 1-877-5PERMIT		

**Department of Environmental Quality - Air Quality Division
Toxic Air Pollutant (TAP) Preconstruction Compliance
Application Completeness Checklist**

This checklist is designed to aid the applicant in submitting a complete preconstruction compliance demonstration for toxic air pollutants (TAPs) in permit to construct applications.

I. Actions Needed Before Submitting Application

- ☒ Refer to the Rule. Read the Demonstration of Preconstruction Compliance with Toxic Standards contained in IDAPA 58.01.01.210 (Section 210) Rules for the Control of Air Pollution in Idaho. Toxic air pollutants are regulated in accordance with Section 210 only from emission units constructed or modified on or after July 1, 1995.

Determine if a new (constructed after June 30, 1995) emission unit has the potential to emit a toxic air pollutant (TAP) listed in IDAPA 58.01.01.585 (Section 585) or IDAPA 58.0101.586 (Section 586). Potential toxic air pollutants can be determined by reviewing commonly available emission factors, such as EPA's AP-42, or calculating emissions using a mass balance. For toxic air pollutants that are emitted but not listed in Section 585 and 586, contact the Air Permit Hotline at 877-5PERMIT.

Determine if the proposed construction or modification is exempt from the need to obtain a permit to construct in accordance with IDAPA 58.01.01.220-223. Use the Exemption Criteria and Reporting Requirements for Toxic Air Pollutants IDAPA 58.01.01.223 checklist to assist you in the exemption determination. For all sources that do not qualify for an exemption in accordance with IDAPA 58.01.01.220-223 complete the following checklist and submit it with the permit application. Please note that fugitive TAP emissions are not included in the IDAPA 58.01.01.223 exemption determination, but fugitive TAP emissions are included in the analysis if a permit is required.

Will the new or modified source result in new or increased emissions of toxic air pollutants?

- ☒ Yes. If yes, continue to section II.
- ☐ No. If no, no further action is required.

II. Application Content

If a new source has the potential to emit a TAP, or if a modification to an existing source increases the potential to emit of a TAP, then one of the following methods (A-J) of demonstrating TAP preconstruction compliance must be documented for each TAP. Standard methods are one of A-C. The applicant may also use one of the specialized methods in D-J. Fugitive TAP emissions shall be included in the analysis. The compliance methods are based on the requirements of Section 210. Applicants are often able to demonstrate preconstruction TAP compliance using a combination of methods A and B.

Emission Calculations

Emissions calculation methodologies used are dependent on whether a specific TAP is a non-carcinogen or a carcinogen and whether the compliance method chosen from the list below calls for controlled or uncontrolled emissions. Non-carcinogens are regulated as a 24-hour averaged increment and values used for comparison to the non-carcinogen screening emissions level (EL) should be the maximum controlled or uncontrolled emissions quantity during any 24-hour period divided by 24. Carcinogens are regulated as a long term increment and values used for

comparison to the carcinogen EL should be the maximum controlled or uncontrolled emissions quantity during any 1 year period divided by 8760.

Modeling Analyses

Atmospheric dispersion modeling is required when applicable TAP emissions quantities exceed ELs. Modeling analyses should be conducted in accordance with IDAPA 58.01.01.210.03. Quantification of Ambient Concentrations and the State of Idaho Air Quality Modeling Guideline (http://www.deq.idaho.gov/air/data_reports/publications.cfm#model). For non-carcinogen 24-hour increments, compliance is demonstrated using the maximum modeled 24-hour-averaged concentration from available meteorological data (typically a five-year data set). For carcinogen long-term increments, compliance is demonstrated using the maximum modeled average concentration for the duration of the data set (one-year to five-year data set).

A submitted modeling report should clearly specify modeled emissions rates and results. All electronic model input files should be submitted, including BPIP input files.

Compliance Methods

Fill in letter(s) (A-J) from the list below for TAP compliance demonstration method(s) used: _____.

A. TAPs Compliance Using Uncontrolled Emissions (Section 210.05)

- ☐ Calculate the uncontrolled emissions (Section 210.05) of each TAP from new emissions units. Uncontrolled emission rates are emissions at maximum capacity without the effect of physical or operational limitations. See Quantification of Emission Rates (Section 210.02). Show calculations and state all assumptions.
- ☐ Calculate the increase of TAP emissions from modified emissions units. Show calculations and state all assumptions. The increase in emissions for a modified emission unit is determined by subtracting the potential to emit the TAP before the modification from the uncontrolled potential to emit after the modification. In conducting this analysis please note the following for TAP emission rate increase determinations:

Uncontrolled emission rates after the modification are emissions at maximum capacity without the effect of physical or operational limitations.

When determining the emissions increase from existing permitted emissions units the emission rate before the modification is equivalent to the emission limits contained in the permit for the TAPs or, if there no emission limits in the permit, by determining what the emission rate is under the physical or operational limitations contained in the permit.

- ☐ Aggregate the uncontrolled emissions for each TAP from all new emissions units with the increase in emissions from all modified emissions units.
- ☐ If the aggregated emissions increase for each TAP from the new and modified units, as determined above, are less than or equal to the respective TAP screening emissions level (EL) then preconstruction compliance with toxic standards has been demonstrated and no further analysis is required. Submit a table comparing the uncontrolled emissions rate to the applicable EL.

If aggregated emissions are greater than the respective screening emissions level (EL) for any pollutants, use another compliance demonstration method for those pollutants, such as methods B, C, or D.

B. TAP Compliance Using Uncontrolled Ambient Concentration (Section 210.06)

- ☐ Determine the uncontrolled emissions of each TAP from new emission units and the increase in emissions from all modified emissions units as described above in compliance Method A. Show calculations and state all assumptions.
- ☐ Model the uncontrolled emissions of each TAP from new emissions units and the increase in emissions from all modified emissions units.
- ☐ If the uncontrolled ambient concentration is less than or equal to the acceptable ambient concentration increment listed in Section 585 and 586 no further procedures for demonstrating preconstruction compliance will be required for that toxic air pollutant as part of the application process. Submit a table comparing uncontrolled ambient concentrations to the applicable acceptable ambient concentration.

C. TAP Compliance Using Controlled Ambient Concentrations (Section 210.08)

- ☒ Determine the controlled emissions from new emissions units and the controlled emission increase from modified emissions units. Show all calculations and state all assumptions, including the control methods.
- ☒ Model the controlled emissions of each TAP from new emissions units and the increase in controlled emissions from all modified emissions units.
- ☒ If the controlled ambient concentration from emission increases from new emissions units and modified emissions units is less than the applicable acceptable ambient concentration no further procedures for demonstrating preconstruction compliance are required.
- ☐ The Department shall include an emission limit for the toxic air pollutant in the permit to construct that is equal to or, if requested by the applicant, less than the emission rate that was used in the modeling (Section 210.08.c).

In some instances the Department may consider a throughput limit or other inherently-limiting operational restriction in a permit as an effective emission limit for the TAP, rather than a TAP-specific emissions limit. Note that the applicant may model uncontrolled emissions as described in compliance Method B in an attempt to avoid TAPs emissions limitations.

D. TAPs Compliance for NSPS and NESHAP Sources (Section 210.20)

- ☐ If the owner or operator demonstrates that the toxic air pollutant from the source or modification is regulated by the Department or EPA at the time of the permit issuance under 40 CFR Part 60, 40 CFR Part 61 or 40 CFR Part 63, no further procedures for demonstrating preconstruction compliance will be required for that toxic air pollutant.
- ☐ Provide a demonstration that the toxic air pollutant is regulated under 40 CFR Part 60, 40 CFR Part 61 or 40 CFR Part 63. This demonstration must be specific for each TAP emitted.

E. TAP Compliance Using Net Emissions (Section 210.09)

An applicant may use TAP net emissions to show preconstruction compliance; however this analysis may require more work than some of the others procedures available to demonstrate preconstruction compliance. When netting, emissions increases and decreases of the TAP that have occurred within five years must be included in the analysis as described below.

- ☐ Determine the net emission increase for a TAP. A net emissions increase shall be an emission increase from a particular modification plus any other increase and decreases in actual emissions at the facility that are creditable and contemporaneous with particular modification (Section 210.09). Show all calculations and state all assumptions.
- ☐ A creditable increase or decrease in actual emissions is contemporaneous with a particular modification if it occurs within five (5) years of the commencement of the construction or modification (Section 210.09.a).

Actual emissions are (Section 006.03):

- ☐ In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the unit actually emitted the pollutant during a two year period which precedes the particular date and which is representative of normal source operation. The Department shall allow the use of a different time period upon a determination that it is more representative of normal source operation. Actual emissions shall be calculated using the unit's actual operating hours, productions rates, and types of materials processed, stored, or combusted during the selected time period.
- ☐ The Department may presume that the source-specific allowable emissions for the unit are equivalent to actual emissions of the unit.
- ☐ For any emission unit (except electric utility steam generating units) that has not begun normal operations on the particular date, actual emissions shall equal the potential to emit of the unit on that date.
- ☐ Do not include emissions increases from emission units that have an uncontrolled emission rate that is 10% or less than the applicable screening emission level (EL) in Section 585 and 586 (Section 007.09.c.ii) and do not include emission increases from environmental remediation sources (Section 007.09.c.iii). Show all calculations and state all assumptions.
- ☐ If the net emission increase is less than or equal to the applicable screening emissions level (EL) listed in Section 585 and 586, no further procedures for demonstrating preconstruction compliance will be required (Section 210.09.c).
- ☐ The Department shall include emission limits and other permit terms for the toxic air pollutant in the permit to construct that will assure that the facility will be operated in the manner described in the preconstruction compliance demonstration (Section 210.09.d).

In some instances the Department may consider a throughput limit or other inherently-limiting operational restriction in a permit as an effective emission limit for the TAP, rather than a TAP-specific emissions limit.

F. TAP Compliance Using Net Ambient Concentration (Section 210.10)

- ☐ Determine the emission increase from the new source or modification, and all other creditable emission increases and decrease using the methods described above in compliance Method E.
- ☐ Model the emissions increases and decreases for each TAP. Modeling TAP decreases is accomplished by using negative valued emissions rates in the model input.
- ☐ If the net ambient concentration is less than or equal to the applicable ambient concentration increment listed in Section 585 and 586, no further procedures for demonstrating preconstruction compliance are required.

- ☐ The Department shall include emission limits and other permit terms for the toxic air pollutant in the permit to construct that will assure that the facility will be operated in the manner described in the preconstruction compliance demonstration (Section 210.10.d).

In some instances the Department may consider a throughput limit or other inherently-limiting operational restriction in a permit as an effective emission limit for the TAP, rather than a TAP-specific emissions limit.

G. TAP Compliance Using T-RACT Ambient Concentration for Carcinogens (Section 210.12)

The applicant may use T-RACT to demonstrate preconstruction compliance for toxic air pollutants listed in Section 586 only.

T-RACT is an emissions standard based on the lowest emission of toxic air pollutants that a particular source is capable of meeting by application of control technology that is reasonably available, as determined by the Department, considering technological and economic feasibility. If control technology is not feasible, the emission standard may be based on the application of a design, equipment, work practice or operational requirement, or combination thereof (Section 007.16).

T-RACT Submittal Requirements

- ☐ The applicant shall submit the following information to the Department identifying and documenting which control technologies or other requirements the applicant believes to be T-RACT (Section 210.14).

The technical feasibility of a control technology or other requirements for a particular source shall be determined considering several factors including but not limited to:

- ☐ Process and operating procedures, raw materials and physical plant layout.
- ☐ The environmental impacts caused by the control technology that can not be mitigated, including but not limited to, water pollution and the production of solid wastes.
- ☐ The energy requirements of the control technology.

The economic feasibility of a control technology or other requirement, including the costs of necessary mitigation measures, for a particular source shall be determined considering several factors including, but not limited to:

- ☐ Capital costs.
- ☐ Cost effectiveness, which is the annualized cost of the control technology divided by the amount of emission reduction.
- ☐ The difference in costs between the particular source and other similar sources, if any, that have implemented emissions reductions.

- ☐ Compare the source's or modification's approved T-RACT ambient concentration to the applicable acceptable ambient concentration increment listed in Section 586 multiplied by a factor of 10. If the sources approved T-RACT concentration is less than or equal to 10 times the applicable acceptable ambient concentration increment listed in Section 586, no further procedures for demonstrating preconstruction compliance will be required.

- ☐ If an application is submitted to the Department without T-RACT and determined complete, and T-RACT is later determined to be applicable the completeness determination of the application will be revoked until a supplemental application is submitted and determined complete. When the supplemental application is determined complete, the timeline for agency action shall be reinitiated (Section 210.13.b).

- ☐ If the Department determines that the source has proposed T-RACT, the Department shall develop emission standards to be incorporated into a permit to construct.

In some instances, the Department may consider a throughput limit or other inherently limiting operational restriction in a permit as an effective emission limit for the TAP, rather than a TAP-specific emissions limit.

H. TAP Compliance Using the Short Term Source Factor (Section 210.15)

- ☐ For short term sources, the applicant may utilize a short term adjustment factor of ten (10) only for a carcinogenic pollutant listed in Section 586. For a carcinogen listed in Section 586 multiply either the applicable acceptable ambient concentration increment or the screening emission rate (EL), but not both, by ten (10) to demonstrate preconstruction compliance (Section 210.15).
- ☐ A short term source is any new stationary source or modification to an existing source, with an operational life no greater than five (5) years from the inception of any operations to cessation of actual operations (Section 210.15).

I. TAP Compliance for Environmental Remediation Sources (Section 210.16)

- ☐ For remediation sources subject to or regulated by the Resource Conservation and Recovery Act and the Idaho Rules and Standard for Hazardous Waste, or the comprehensive Environmental Response, Compensation and Liability Act or a consent order, if the estimated ambient concentration is greater than the acceptable ambient impact increment listed in Section 585 and 586, Best Available Control Technology shall be applied and operated until the estimated uncontrolled emission from the remediation source are below the applicable acceptable ambient concentration increment (Section 210.16).

J. TAP Compliance Using Offset Ambient Concentration (Section 210.11)

- ☐ Contact the Department prior to proposing to utilize Offset Ambient Concentrations to demonstrate preconstruction compliance.
- ☐ Emission offsets must satisfy the requirements for emission reduction credits (Section 460).
- The proposed level of allowable emissions must be less than the actual emissions of the emissions units providing the offsets (Section 460.01).
 - An air quality permit must be issued that restricts the potential to emit of the emission unit providing the offset.
 - Emission reduction imposed by local, state or federal regulations or permits shall not be allowed.
- ☐ Compare the source's or modifications approved emission offset ambient concentration to the applicable acceptable ambient concentration listed in Section 585 and 586. If the source's or modifications approved offset concentration is less than the acceptable ambient concentration listed in Section 585 and 586, no further procedures for demonstrating preconstruction compliance will be required.



The Department shall include emission limits and other permit terms for the toxic air pollutant in the permit to construct that will assure that the facility will be operated in the manner described in the preconstruction compliance demonstration (Section 210.10.d).



Department of Environmental Quality - Air Quality Division Minor Source Permit to Construct Application Completeness Checklist

This checklist is designed to aid the applicant in submitting a complete permit to construct application.

I. Actions Recommended Before Submitting Application

- ☒ Refer to the Rule. Read the Permit to Construct requirements contained in IDAPA 58.01.01.200-228, Rules for the Control of Air Pollution in Idaho. The Rules are available on DEQ's website (go to <http://adm.idaho.gov/adminrules/rules/idapa58/0101.pdf>).
- ☒ Refer to DEQ's Permit to Construct Guidance Document. DEQ has developed a guidance document to aid applicants in submitting a complete permit to construction application. The guidance document is located on DEQ's website (go to http://www.deq.idaho.gov/air/permits_forms/permitting/ptc_prepermit_guidance.pdf).
- ☒ Consult with DEQ Representatives. It is recommended that the applicant consult with DEQ to discuss application requirements before submitting the permit to construct application. The consultation can be in person or on the phone. Contact DEQ's Air Quality Hotline at **877-5PERMIT** to schedule the consultation.
- ☒ Submit Ambient Air Quality Modeling Protocol. It is required that an ambient air quality modeling protocol be submitted to DEQ at least two (2) weeks before the permit to construct application is submitted. Contact DEQ's Air Quality Hotline at **877-5PERMIT** for information about the protocol.

II. Application Content

Application content should be prepared using the checklist below. The checklist is based on the requirements contained in IDAPA 58.01.01.202.

- ☒ Apply for a Permit to Construct. Submit a Permit to Construct application using forms available on DEQ's website at http://www.deq.idaho.gov/air/permits_forms/forms/ptc_general_application.pdf.
- ☒ Permit to Construct Application Fee. The permit to construct application fee must be submitted at the time the original pre-permit construction approval application is submitted. Refer to IDAPA 58.01.01.224.
- ☒ Process Description(s). The process or processes for which construction is requested must be described in sufficient detail and clarity such that a member of the general public not familiar with air quality can clearly understand the proposed project. A process flow diagram is required for each process for which pre-permit construction approval is requested.
- ☒ Equipment List. All equipment that will be used for which construction is requested must be described in detail. Such description includes, but is not limited to, manufacturer, model number or other descriptor, serial number, maximum process rate, proposed process rate, maximum heat input capacity, stack height, stack diameter, stack gas flowrate, stack gas temperature, etc. All equipment that will be used for which construction is requested must be clearly labeled on the process flow diagram.
- ☒ Potential to Emit. Submit the uncontrolled potential to emit (pre-control equipment emissions estimates) and the controlled potential to emit (post-control equipment emissions estimates) for all equipment for which construction is requested. Any limit on the equipment for which construction is requested may become a limit on that equipment in the permit to construct.
- ☒ Potential to Emit and Modeled Ambient Concentration for All Regulated Air Pollutants. All proposed emission limits and modeled ambient concentrations for all regulated air pollutants must demonstrate compliance with all applicable air quality rules and regulations. Regulated air pollutants include criteria air pollutants, toxic air pollutants listed pursuant to IDAPA 58.01.01.585 and 586, and hazardous air pollutants listed pursuant to



Section 112 of the 1990 Clean Air Act Amendments (go to <http://www.epa.gov/ttn/atw/188polls.html>). Describe in detail how the proposed emissions limits and modeled ambient concentrations demonstrate compliance with each applicable air quality rule and regulation. It is requested that emissions calculations, assumptions, and documentation be submitted with sufficient detail so DEQ can verify the validity of the emissions estimates.

- ☒ Scaled Plot Plan. It is required a scaled plot plan be included in the permit to construct application and must clearly label the location of each proposed process and the equipment that will be used in the process.
- ☒ List all Applicable Requirements. All applicable requirements must be cited by the rule or regulation section/subpart that applies for each emissions unit.
- ☒ Certification of Permit to Construct Application. The permit to construct application must be signed by the Responsible Official and must contain a certification signed by the Responsible Official. The certification must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Refer to IDAPA 58.01.01.123.
- ☒ Submit the Permit to Construct Application. Submit the permit to construct application and processing fee to the following address:

Air Quality Program Office – Application Processing
Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706-1255

APPENDIX C

PTC Emission Calculations and PTE Summary

Agrium Conda Phosphate Operations

Gyp Stacks - Fugitive Dust and Fluoride Emissions

F-Gyp-2

Gyp Stacks

Emission Factor = 0.72xU

AP-42 5th Ed., Section 11.9, Table 11.9-1 (Storage Piles), dated July 1998.

Where: U = mean wind speed (mph) = 4.85 mph (average), based on 2005, on-site met data.

Based on 125 acre area Gyp pile

Emission Factors

Pollutant	Uncontrolled Emission Factor	Source
PM	3.49 lb/acre/day	Gyp Pile
PM-10 ¹	1.65 lb/acre/day	Gyp Pile
PM-2.5 ¹	0.25 lb/acre/day	Gyp Pile
Fluoride ²	1.60 lb/acre/day	Gyp Pile/Pond

Notes:

1. Since an emission factor scaling factor is not provided for PM10 or PM2.5, the particle size multiplier ratios, defined in AP-42 Section 13.2.4 will be used. The particle size multiplier is 0.74 for TSP and 0.35 for PM10, therefore the ratio will be 0.35/0.74 = 0.47.
The particle size multiplier is 0.74 for TSP and 0.053 for PM2.5, therefore the ratio will be 0.053/0.74 = 0.07.
2. Fugitive fluoride emissions are determined using an emission factor of 1.6 lb/acre/day. This emission factor has been reviewed and approved by IDEQ, as established in a prior approved gyp stack PTC application, submitted April 29, 2005.

Gyp Stacks - Fugitive Potential Emissions

Source ID	Pollutant	Control Method	Control Efficiency ¹	Daily Emissions lb/day	Annual Emissions (lb/yr)	Annual Emissions (ton/yr)
GYP-2	PM	Wet Slurry to Hardened Crust	95%	21.83	7,966	3.98
	PM-10		95%	10.32	3,768	1.88
	PM-2.5		95%	1.56	571	0.29
	Fluoride		95%	10.00	3,650	1.83

Notes:

1. Phosphogypsum is slurried to a pile, referred to as a "gyp stack". The slurry is about 20% solids. The settled phosphogypsum is allowed to dry, creating a solid hardened crust. Therefore, a 95% control efficiency is applied.

Example Calculation:

$$EF \text{ (lb/acre/day)} \times (125 \text{ acres}) \times (365 \text{ day/yr}) \times CE \text{ (1-0.95)} = \text{Emissions (lb/yr)}$$

Agrium Conda Phosphate Operations												8/2/07	
Potential to Emit (PTE) Summary													
Rev. #2													
Emission Sources		PM (tpy)	PM10 (tpy)	PM2.5 (tpy)	SO2 (tpy)	NOx (tpy)	CO (tpy)	VOC (tpy)	Fluoride (tpy)	H2SO4 (tpy)	NH3 (tpy)	HAP (tpy)	
Phosphoric Acid Production		91.11	22.78	3.42					3.78			0.04	
Gyp Stacks													
Wind Erosion	F-Gyp-0	3.98	1.88	0.29					1.83				
Wind Erosion	F-Gyp-1	3.98	1.88	0.29					1.83				
Wind Erosion	F-Gyp-2	3.98	1.88	0.29					1.83				
Fugitive Dust													
Heavy Equipment Operation	F-Eqp-1	1.36	0.29	0.10									
Vehicles - Unpaved Plant Roads	F-R-1	7.18	1.85	0.19									
SPA Production	S-Pb-1	80.71	20.18	3.03		7.76			1.50				
Nebraska Boiler B-5	S-Nb-1	4.42	4.42	0.66	0.53	70.71	35.40	1.50				0.02	
Cleaver Brooks Boiler	A-Cb-1	2.45	2.45	0.37	0.19	33.00	27.13	1.78				1.66	
Thermal Oil Heaters	S-Pa-2	1.67	1.67	0.25	0.13	16.46	18.43	1.21				0.61	
Cooling Tower (PPA)	CP-3136602	1.09	0.36	0.05								0.41	
Cooling Tower (East Plant)	CP-3133013	10.57	3.49	0.52									
Granulation Plant													
Fertilizer Production	S-Fa-1	23.05	5.76	0.86					6.13		35.00	0.06	
Dryer Natural Gas Combustion	S-Fa-2	1.79	1.79	0.27	0.14	23.62	19.84	1.30				0.45	
Dry Product Storage and Loadout													
Fertilizer Loadout to Trucks	F-Fc-1	15.00	3.75	0.56					0.50				
Dry Product Sizing Transfer	F-Fb-1	15.00	3.75	0.56					0.50				
Sulfuric Acid Production	S-Se-1	12.63	3.16	0.01	944.00					35.40			
Ammonia Sphere (Fugitive)	F-Amm-1										16.30		
Totals, Plantwide		279.99	81.35	11.71	945.00	151.55	100.80	5.78	17.88	35.40	51.30	3.25	

APPENDIX D

Applicable Federal Regulations and State Rules

Table D-1: Applicable Federal Regulations

PTC Applicable Source	Citation Under Federal Regulations	Applicable Requirement?	Description of Requirements or Standards
Facility Wide	40 CFR Part 51	Yes	Regional Haze Regulations
Facility Wide	40 CFR Part 52	Yes	Approval and Promulgation of Implementation Plans; Rules for Prevention of Significant Deterioration.
Does not apply to the gyp stacks	40 CFR Part 60	No	Standards of Performance for New Stationary Sources.
Does not apply to the gyp stacks	40 CFR Part 60, Subpart T	No	Standards of Performance for the Phosphate Fertilizer Industry: Wet Process Phosphoric Acid Plants.
Does not apply to the gyp stacks	40 CFR Part 60, Subpart U	No	Standards for performance for the phosphate fertilizer industry: Superphosphoric Acid Plants
Does not apply to the gyp stacks	40 CFR Part 60, Subpart V	No	Standards of Performance for the Phosphate Fertilizer Industry: Diammonium Phosphate Plants.
Does not apply to the gyp stacks	40 CFR Part 61, Subpart M	No	National Emission Standards for Hazardous Air Pollutants, Asbestos.
Does not apply to the gyp stacks	40 CFR Part 63	No	National Emission Standards for Hazardous Air Pollutants for Source Categories.
Does not apply to the gyp stacks	40 CFR Part 63, Subpart AA	No	National Emission Standards for Hazardous Air Pollutants from Phosphoric Acid Manufacturing Plants.
Does not apply to the gyp stacks	40 CFR Part 63, Subpart BB	No	National Emission Standards for Hazardous Air Pollutants from Phosphate Fertilizer Production Plants.
Facility Wide	40 CFR Part 70	Yes	State Operating Permit Program.
Does not apply to the gyp stacks	40 CFR Part 82	No	Chlorofluorocarbon Regulations.

Table D-2: Applicable State Rules

	Emissions Unit	Citation Under IDAPA 58.01.01	Applicable Requirement	Description of Requirements or Standards
	N/A	000	No	LEGAL AUTHORITY.
	N/A	001	No	TITLE AND SCOPE.
	N/A	002	No	WRITTEN INTERPRETATIONS.
	N/A	003	No	ADMINISTRATIVE APPEALS.
	N/A	004	No	CATCHLINES.
	N/A	005	No	DEFINITIONS.
1	Facility Wide	006	Yes	GENERAL DEFINITIONS.
2	Facility Wide	007	Yes	DEFINITIONS FOR THE PURPOSES OF SECTION 200 THROUGH 225 AND 400 THROUGH 461.
3	Facility Wide	008	Yes	DEFINITIONS FOR THE PURPOSES OF SECTION 300 THROUGH 387.
4	Facility Wide	009	Yes	DEFINITIONS FOR THE PURPOSES OF 40 CFR PART 60.
5	Facility Wide	010	Yes	DEFINITIONS FOR THE PURPOSES OF 40 CFR PART 61 AND 40 CFR PART 63.
6	Facility Wide	011	Yes	DEFINITIONS FOR THE PURPOSES OF SECTION 790 THROUGH 799
	N/A	106	No	ABBREVIATIONS.
	N/A	107	No	INCORPORATIONS BY REFERENCE.
	N/A	121	No	COMPLIANCE REQUIREMENTS BY DEQ.
7	Facility Wide	122	Yes	INFORMATION ORDERS BY DEQ.
8	Facility Wide	123	Yes	CERTIFICATION OF DOCUMENTS.
9	Facility Wide	124	Yes	TRUTH, ACCURACY AND COMPLETENESS OF DOCUMENTS.
10	Facility Wide	125	Yes	FALSE STATEMENTS.
11	Facility Wide	126	Yes	TAMPERING.
12	Facility Wide	127	Yes	FORMAT OF RESPONSES.
	N/A	128	No	CONFIDENTIAL INFORMATION.
	Does not apply to the gyp stacks	130	No	UPSET AND BREAKDOWN REQUIREMENTS.
	Does not apply to the gyp stacks	131	No	EXCESS EMISSIONS. •Applicability.
	Does not apply to the gyp stacks	132	No	CORRECTION OF CONDITION. •Excess emission events must be corrected with all practical speed.

	Emissions Unit	Citation Under IDAPA 58.01.01	Applicable Requirement	Description of Requirements or Standards
	Does not apply to the gyp stacks	133	No	STARTUP, SHUTDOWN AND SCHEDULED MAINTENANCE REQUIREMENTS. •Prescribes procedures for where startup, shutdown, or scheduled maintenance is expected to result in an excess emissions event.
	Does not apply to the gyp stacks	134	No	UPSET, BREAKDOWN AND SAFETY REQUIREMENTS. •Prescribes procedures for where upset, breakdown, or the initiation of safety measures is expected to result in an excess emissions event.
	Does not apply to the gyp stacks	135	No	EXCESS EMISSIONS REPORTS. •Written reports for each excess emissions must be submitted to the Department within 15 days after the beginning of the event.
	Does not apply to the gyp stacks	136	No	EXCESS EMISSIONS RECORDS. •Records of excess emissions must be maintained for 5 years.
	N/A	140-149	No	VARIANCE PROCEDURES and PETITIONS.
13	Facility Wide	155	Yes	CIRCUMVENTION.
14	Facility Wide	156	Yes	TOTAL COMPLIANCE.
15	Facility Wide	157	Yes	TEST METHODS AND PROCEDURES. •Establishes procedures and requirements for test methods and results.
	N/A	160	No	PROVISIONS GOVERNING SPECIFIC ACTIVITIES AND CONDITIONS.
16	Facility Wide	161	Yes	TOXIC SUBSTANCES. •Toxic contaminants shall not be emitted as to injure or unreasonably affect human or animal life or vegetation.
	N/A	162	No	MODIFYING PHYSICAL CONDITIONS.
	N/A	163	No	SOURCE DENSITY.
	N/A	164	No	POLYCHLORINATED BIPHENYLS (PCBS).
	N/A	199	No	Electric Generating Unit Construction Prohibition
17	Facility Wide	200	Yes	PROCEDURES AND REQUIREMENTS FOR PERMITS TO CONSTRUCT.
18	Facility Wide	201	Yes	PERMIT TO CONSTRUCT REQUIRED.
19	Facility Wide	202	Yes	APPLICATION PROCEDURES.
20	Facility Wide	203	Yes	PERMIT REQUIREMENTS FOR NEW AND MODIFIED STATIONARY SOURCES.
	N/A	204	No	PERMIT REQUIREMENTS FOR NEW MAJOR FACILITIES OR MAJOR MODIFICATIONS IN NONATTAINMENT AREAS •Source is not located in a non-attainment area

	Emissions Unit	Citation Under IDAPA 58.01.01	Applicable Requirement	Description of Requirements or Standards
21	Facility Wide	205	Yes	PERMIT REQUIREMENTS FOR NEW MAJOR FACILITIES OR MAJOR MODIFICATIONS IN ATTAINMENT OR UNCLASSIFIABLE AREAS
22	Facility Wide	206	Yes	OPTIONAL OFFSETS FOR PERMITS TO CONSTRUCT
23	Facility Wide	207	Yes	REQUIREMENTS FOR EMISSION REDUCTION CREDIT
24	Facility Wide	208	Yes	DEMONSTRATION OF NET AIR QUALITY BENEFIT.
25	Facility Wide	209	Yes	PROCEDURE FOR ISSUING PERMITS.
26	Facility Wide	210	Yes	DEMONSTRATION OF PRECONSTRUCTION COMPLIANCE WITH TOXIC STANDARDS.
27	Facility Wide	211	Yes	CONDITIONS FOR PERMITS TO CONSTRUCT.
28	Facility Wide	212	Yes	OBLIGATIONS TO COMPLY.
29	Facility Wide	213	Yes	PRE-PERMIT CONSTRUCTION.
30	Facility Wide	214	Yes	DEMONSTRATION OF PRECONSTRUCTION COMPLIANCE FOR NEW AND RECONSTRUCTED MAJOR SOURCES OF HAZARDOUS AIR POLLUTANTS.
31	Facility Wide	220	Yes	GENERAL EXEMPTION CRITERIA FOR PERMIT TO CONSTRUCT APPLICATIONS.
32	Facility Wide	221	Yes	CATEGORY I EXEMPTION.
33	Facility Wide	222	Yes	CATEGORY II EXEMPTION.
34	Facility Wide	223	Yes	EXEMPTION CRITERIA AND REPORTING REQUIREMENTS FOR TOXIC AIR POLLUTANT EMISSIONS.
35	Facility Wide	224-227	Yes	PERMIT TO CONSTRUCT FEES.
36	Facility Wide	228	Yes	APPEALS.
37	Facility Wide	300	Yes	PROCEDURES AND REQUIREMENTS FOR TIER I OPERATING PERMITS.
38	Facility Wide	301	Yes	REQUIREMENT TO OBTAIN TIER I OPERATING PERMIT. •No owner or operation shall operate, or allow to tolerate the operation of any Tier I source without a Tier I operating permit.
39	Facility Wide	302	Yes	OPTIONAL TIER I OPERATING PERMIT.
40	Facility Wide	311	Yes	STANDARD PERMIT APPLICATIONS.
41	Facility Wide	312	Yes	DUTY TO APPLY.
42	Facility Wide	313	Yes	TIMELY APPLICATION.

	Emissions Unit	Citation Under IDAPA 58.01.01	Applicable Requirement	Description of Requirements or Standards
43	Facility Wide	314	Yes	REQUIRED STANDARD APPLICATION FORM AND REQUIRED INFORMATION.
44	Facility Wide	315	Yes	DUTY TO SUPPLEMENT OR CORRECT APPLICATION.
45	Facility Wide	316	Yes	EFFECT OF INACCURATE INFORMATION IN APPLICATIONS OR FAILURE TO SUBMIT RELEVANT INFORMATION.
46	Facility Wide	317	Yes	INSIGNIFICANT ACTIVITIES.
47	Facility Wide	321	Yes	TIER I OPERATING PERMIT CONTENTS.
48	Facility Wide	322	Yes	STANDARD CONTENTS OF TIER I OPERATING PERMITS.
49	Facility Wide	325	Yes	ADDITIONAL CONTENTS OF TIER I OPERATING PERMITS - PERMIT SHIELD.
50	Facility Wide	332	Yes	EMERGENCY AS AN AFFIRMATIVE DEFENSE REGARDING EXCESS EMISSIONS.
	N/A	335	No	GENERAL TIER I OPERATING PERMITS AND AUTHORIZATIONS TO OPERATE.
	N/A	336	No	TIER I OPERATING PERMITS FOR TIER I PORTABLE SOURCES.
	N/A	360-368	No	STANDARD PROCESSING OF TIER I OPERATING APPLICATIONS.
51	Facility Wide	369	Yes	TIER I OPERATING PERMIT RENEWAL.
52	Facility Wide	380-386	Yes	CHANGES TO TIER I OPERATING PERMITS.
53	N/A	387-397	Yes	REGISTRATION AND REGISTRATION FEES.
	N/A	400-410	No	PROCEDURES AND REQUIREMENTS FOR TIER II OPERATING PERMITS.
	N/A	440	No	REQUIREMENTS FOR ALTERNATIVE EMISSION LIMITS (BUBBLES).
	N/A	441	No	DEMONSTRATION OF AMBIENT EQUIVALENCE.
	N/A	460	No	REQUIREMENTS FOR EMISSION REDUCTION CREDIT.
	N/A	461	No	REQUIREMENTS FOR BANKING EMISSION REDUCTION CREDITS (ERC'S).
	N/A	500	No	REGISTRATION PROCEDURES AND REQUIREMENTS FOR PORTABLE EQUIPMENT.
54	Facility Wide	510-516	Yes	STACK HEIGHTS AND DISPERSION TECHNIQUES.
	N/A	550-562	No	AIR POLLUTION EMERGENCY RULE.
55	Facility Wide	563-574	Yes	TRANSPORTATION CONFORMITY
	N/A	576	No	GENERAL PROVISIONS FOR AMBIENT AIR QUALITY STANDARDS.

	Emissions Unit	Citation Under IDAPA 58.01.01	Applicable Requirement	Description of Requirements or Standards
	N/A	577	No	AMBIENT AIR QUALITY STANDARDS FOR SPECIFIC AIR POLLUTANTS. •Standards do not apply to individual stationary sources.
	N/A	578	No	DESIGNATION OF ATTAINMENT, UNCLASSIFIABLE AND NONATTAINMENT AREAS. •Standards do not apply to individual stationary sources.
56	Facility Wide	579-582	Yes	STATE-WIDE PREVENTION OF SIGNIFICANT DETERIORATION PROVISIONS
57	Facility Wide	585	Yes	TOXIC AIR POLLUTANTS NON-CARCINOGENIC INCREMENTS.
	Does not apply to the gyp stacks	586	No	TOXIC AIR POLLUTANTS CARCINOGENIC INCREMENTS.
	N/A	587	No	LISTING OR DELISTING TOXIC AIR POLLUTANT INCREMENTS.
	Does not apply to the gyp stacks	590	No	NEW SOURCE PERFORMANCE STANDARDS. •The owner or operator of any stationary source shall comply with 40 CFR Part 60 as applicable to the stationary source.
	Does not apply to the gyp stacks	591	No	NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS. •The owner or operator of any stationary source shall comply with 40 CFR Part 61 and 40 CFR Part 63 as applicable to the stationary source.
	Does not apply to the gyp stacks	600-608	No	RULES FOR CONTROL OF OPEN BURNING.
	Does not apply to the gyp stacks	609	No	TRAINING FIRES. •Training fires shall not be allowed to smolder after a training session has terminated.
	N/A	610-617	No	RULES FOR SPECIFIC TYPES OF OPEN BURNING.
	Does not apply to the gyp stacks	625	No	VISIBLE EMISSIONS. •Does not apply to fugitive emissions
	N/A	626	No	GENERAL RESTRICTIONS ON VISIBLE EMISSIONS FROM WIGWAM BURNERS.
58	Facility Wide	650	Yes	RULES FOR CONTROL OF FUGITIVE DUST.
59	Facility Wide	651	Yes	GENERAL RULES.
60	Facility Wide	665	Yes	REGIONAL HAZE RULES
61	Facility Wide	666	Yes	REASONABLE PROGRESS GOALS

	Emissions Unit	Citation Under IDAPA 58.01.01	Applicable Requirement	Description of Requirements or Standards
62	Facility Wide	667	Yes	LONG-TERM STRATEGY FOR REGIONAL HAZE
63	Facility Wide	668	Yes	BART REQUIREMENT FOR REGIONAL HAZE
	Does not apply to the gyp stacks	675	No	FUEL BURNING EQUIPMENT.
	Does not apply to the gyp stacks	676	No	STANDARDS FOR NEW SOURCES. •Emissions from any fuel burning equipment with a maximum rated input of 10 million BTU's per hour or more shall not contain particulate matter in excess of 0.015 allowable particulate gr/dscf at 3.0% oxygen.
	Does not apply to the gyp stacks	677	No	STANDARDS FOR MINOR AND EXISTING SOURCES •Emissions from any fuel burning equipment with a maximum rated input of 10 million BTU's per hour or more shall not contain particulate matter in excess of 0.015 allowable particulate gr/dscf at 3.0% oxygen.
	N/A	678	No (no fuel combinations used at facility)	COMBINATIONS OF FUELS.
	Does not apply to the gyp stacks	679	No	AVERAGING PERIOD. •Defines averaging period.
	Does not apply to the gyp stacks	680	No	ALTITUDE CORRECTION. •Adjusts standard conditions for the altitude of the source.
	Does not apply to the gyp stacks	681	No	TEST METHODS AND PROCEDURES. •Prescribes test methods and procedures for performance testing.
	Does not apply to the gyp stacks	700	No	PARTICULATE MATTER - PROCESS WEIGHT LIMITATIONS. •Defines averaging period. •Prescribes test methods and procedures for performance testing.
	Does not apply to the gyp stacks	701	No	PARTICULATE MATTER - NEW EQUIPMENT PROCESS WEIGHT LIMITATIONS. •Emissions from any process or process equipment shall not contain particulate matter in excess of the process weight ratio.
	N/A	702	No	PARTICULATE MATTER - EXISTING EQUIPMENT PROCESS WEIGHT LIMITATIONS.
	N/A	703	No	PARTICULATE MATTER - OTHER PROCESSES.
	N/A	725-727	No	RULES FOR SULFUR CONTENT OF FUELS (DISTRIBUTION).

	Emissions Unit	Citation Under IDAPA 58.01.01	Applicable Requirement	Description of Requirements or Standards
	Does not apply to the gyp stacks	728	No	DISTILLATE FUEL OIL. •Prohibition on use or sell of any distillate fuel oil containing more than ASTM Grade 1 fuel oil - 0.3% sulfur by weight or ASTM Grade 2 fuel oil - 0.5% sulfur by weight.
	N/A	729	No	COAL. •Sulfur content in coal shall not exceed 1.0% sulfur by weight.
	Does not apply to the gyp stacks	750	No	RULES FOR CONTROL OF FLUORIDE EMISSIONS.
	Does not apply to the gyp stacks	751	No	GENERAL RULES. •Emissions from phosphate fertilizer plants shall not contain total fluoride in gaseous and in particulate form in excess of 0.30 pounds of fluoride per ton of P_2O_5 input to the calciner operation. •Fluoride sampling conducted at sites and through methods approved by the Department.
64	N/A	760-764	No	RULES FOR CONTROL OF AMMONIA FROM DAIRY FARMS.
65	Facility Wide	775	Yes	RULES FOR CONTROL OF ODORS.
	Facility Wide	776	Yes	GENERAL RULES. •Odorous gases, liquids or solids shall not be emitted as to cause air pollution.
	N/A	785-788	No	RULES FOR CONTROL OF INCINERATORS.
	N/A	790-799	No	RULES FOR CONTROL OF NONMETALLIC MINERAL PROCESSING
66	Facility Wide	800-802	Yes	REGISTRATION FEES FOR PERMIT BY RULE
	N/A	805-808	No	RULES FOR CONTROL OF HOT-MIX ASPHALT PLANTS.
	N/A	815-826	No	RULES FOR CONTROL OF KRAFT PULPING MILLS.
	N/A	835-839	No	RULES FOR CONTROL OF RENDERING PLANTS.
	Does not apply to the gyp stacks	845	No	RULES FOR CONTROL OF SULFUR OXIDE EMISSIONS FROM SULFURIC ACID PLANTS.
	Does not apply to the gyp stacks	846	No	EMISSION LIMITS. •Emissions from any sulfuric acid plant shall not contain sulfur oxides in excess of 28 lb/ton of 100% sulfuric acid produced.
	Does not apply to the gyp stacks	847	No	MONITORING AND TESTING.. •Prescribes test methods and procedures for performance testing.

	Emissions Unit	Citation Under IDAPA 58.01.01	Applicable Requirement	Description of Requirements or Standards	
				COMPLIANCE SCHEDULE.	
	Does not apply to the gyp stacks	848	No		
	N/A	855-858	No	COMBINED ZINC AND LEAD SMELTERS.	
	N/A	859-860	No	MUNICIPAL SOLID WASTE LANDFILLS	
	N/A	861-862	No	MEDICAL WASTE INCINERATORS	